

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ELECTRIC INSURANCE COMPANY,)	CASE NO. C-1-00-1056
ET AL.)	
Plaintiffs,)	JUDGE WILLIAM O. BERTELSMAN
)	
v.)	DEFENDANT CHRYSLER INS. CO.'S
)	WITNESS AND EXHIBIT LISTS
PHYLLIS H. WALLACE, EXECUTRIX)	
OF THE ESTATE OF)	
CHRISTOPHER S. WALLACE, ET AL.)	
Defendants.)	

Now comes Defendant Chrysler Insurance, by and through counsel, and submits the following exhibit and witness lists as required by the court's pretrial order:

I. Witnesses:

- (A) Michael Brookshire and/or George Barrett (forensic economists retained by the estate of Wallace);
- (B) Phyllis Wallace (decedent's mother and estate representative – expected to testify regarding damages issues);
- (C) Kimberly Ashba (decedent's ex-wife and mother of decedent's daughters – expected to testify regarding damages issues);
- (D) Brian Downey (tortfeasor driver in subject motor vehicle accident – expected to testify regarding facts of accident and preceding events);
- (E) Melanie Hoffer (passenger in Downey/Wallace vehicle – expected to testify regarding facts of accident and preceding events);
- (F) All witnesses identified by the Estate of Wallace; and
- (G) Will supplement if necessary.

II. Exhibits:

- (A) Rental agreement between Christopher Wallace and Mike Castrucci Ford Sales, Inc.;
- (B) Insurance policy between Chrysler Insurance and Mike Castrucci Ford Sales, Inc.;
- (C) Police accident report;
- (D) Coroner's post-mortem report;
- (E) Documents referred to in Brookshire and Barrett's reports of April 28, 2000 and March 31, 2005, including wage and fringe benefit documentation;
- (F) Probate court records produced by the Estate of Wallace;
- (G) Documents produced pursuant to the notice of deposition duces tecum to Phyllis Wallace;
- (H) Stipulations of the parties (Nov 2001);
- (I) Stipulation regarding rental agreement (Nov 2002);
- (J) Exhibits identified by the Estate of Wallace; and
- (K) Will supplement if necessary.

Respectfully submitted,

/s/ Brian A. Meeker
Brian A. Meeker (0063543)
Clifford C. Masch (0015737)
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Chrysler Insurance Company

CERTIFICATE OF SERVICE

The foregoing Witness and Exhibit List was filed via the court's ECF/Pacer system, with service copies provided automatically to all counsel of record.

/s/ Brian A. Meeker
BRIAN A. MEEKER (0063543)